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December 15, 2022

VIA ECF

The Honorable John P. Cronan
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Frank Brunckhorst III v. Bischoff et al.*, No. 1:21-cv-04362-JPC

Dear Judge Cronan,

We represent Plaintiff and Counterclaim-Defendant Frank Brunckhorst III ("Plaintiff") in the above-referenced action. Pursuant to Rule 4 of Your Honor's Individual Rules and Practices in Civil Cases and Section 6 of the S.D.N.Y. ECF Rules and Instructions, we write to respectfully request leave to file redacted versions of Exhibits A, C, D and E (the "Exhibits") to Plaintiff's Motion to Compel (the "Motion"), which is being filed concurrently herewith. Pursuant to Your Honor's Rule 4, the parties have conferred and consented to this request.

The Exhibits contain non-public information concerning business plans of Boar's Head Provisions Co., Inc. ("Boar's Head"), a privately-held company. Given the highly confidential nature of Boar's Head's business plans, we request this information be redacted from the Exhibits. The Motion does not refer to any of the redacted information and thus does not itself need any redactions.

For the foregoing reasons, we respectfully request that the Court permit the redacted versions of the Exhibits, which are reflected in the highlighted versions under seal pursuant to Your Honor's Rule 4 and Section 6 of the S.D.N.Y. ECF Rules and Instructions, to remain on the public docket.

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Respectfully submitted,


/s/ Kevin S. Reed

Kevin S. Reed

The request is granted. The motion may be filed with the proposed redactions to its exhibits. The Clerk of Court is respectfully directed to close the motion pending at Docket Number 204.

SO ORDERED.

Date: December 17, 2022
New York, New York



JOHN P. CRONAN
United States District Judge